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4 2301 Palomino Lane  
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Attorney for Plaintiff

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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 KATHRYN MAYORGA, an individual

Case No.: 2:19-cv-00168-JAD-DJA

11  
12 Plaintiff,

13 vs.

14 CRISTIANO RONALDO, individually,  
15 Does I-XX and Roe Corporations I-XX;  
16 Defendants.

17 **PLAINTIFF'S MOTION TO EXTEND TIME TO REPLY**

18 **TO DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR IN CAMERA**

19 **REVIEW OF THE FOOTBALL LEAKS DOCUMENTS TO DETERMINE WHETHER**

20 **THE CRIME FRAUD EXCEPTION APPLIES [ECF NO. 124]**

21 **(Second Request)**

22 COMES NOW Plaintiff, by and through her attorneys, STOVALL & ASSOCIATES, and  
23  
24 files this motion to extend time to reply to defendant's response to plaintiff's motion for in  
25 camera review of the Football Leaks documents to determine whether the crime fraud exception  
26 applies [ECF NO. 124]. This is the second request for an extension of time made to the court.  
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1 This motion is based upon the pleadings and papers on file herein, the memorandum of  
2 points and authorities attached hereto, and any oral argument this Court may entertain should  
3 there be a hearing on the motion.

4 Dated this 1 day of September, 2021.

5 STOVALL & ASSOCIATES

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17 Attorney for Plaintiff

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**DECLARATION OF PLAINTIFF'S COUNSEL IN SUPPORT OF**  
**PLAINTIFF'S MOTION TO EXTEND TIME**

LESLIE MARK STOVALL, declares and states as follows:

1. I am the attorney of record for the plaintiff in this case.
2. On July 7, 2021 the plaintiff filed motion for in camera review of the Football Leaks documents to determine whether the crime fraud exception applies [ECF NO. 124].
3. On July 28, 2021 the parties agreed to extend the time for defendant to file replies and opposition re: [ECF NOS. 111, 113, 123, 124 and 126] (First Request)
4. The parties agreed that the deadline for plaintiff's reply to defendant's response to plaintiff's motion for in camera review of the Football Leaks documents to

determine whether the crime fraud exception applies [ECF NO. 124] shall be extended from August 25, 2021 to September 1, 2021.

5. On August 18, 2021 Defendant filed his response to plaintiff's motion for in camera review of the Football Leaks documents to determine whether the crime fraud exception applies [ECF NO. 124]
6. On August 19, 2021 counsel for plaintiff email counsel Kendelea Works, Esq. requesting an extension of time for plaintiff to file her reply from August 25, 2021 to September 9, 2021 due counsel for plaintiff being scheduled out of jurisdiction until September 1, 2021.
7. On August 19, 2021 counsel for defendant email plaintiff's counsel a blank email with the July 28, 2021 filed stipulation attached which was granted with an extension of time for plaintiff to file her reply from August 25, 2021 to September 1, 2021.
8. On August 20, 2021 plaintiff's counsel email Ms. Works to request an additional time for plaintiff to file her reply from September 1, 2021 to September 9, 2021 due to counsel for plaintiff scheduled out of jurisdiction. Counsel for defendant did not respond.
9. I am requesting an extension of time to file plaintiff's reply to defendant's response to plaintiff's motion for in camera review of the Football Leaks documents to determine whether the crime fraud exception applies [ECF NO. 124] because I have not been able to begin work on the reply due to my office's back log since my return from out of the country.
10. I am requesting that the court extend the time for the filing of the plaintiff's reply to defendant's response to plaintiff's motion for in camera review of the Football

Leaks documents to determine whether the crime fraud exception applies [ECF NO. 124] from September 1, 2021 to September 14, 2021.

11. This motion is made in good faith and not for propose of unnecessary delay.

I declare under penalty of perjury under the laws of Nevada that the foregoing is true and correct.

DATED this 1 day of September, 2021.

  
LESLIE MARK STOVALL, ESQ.

### MEMORANDUM OF POINTS AND AUTHORITIES

FRCP 6(b) states:

When an act may or must be done within a specific time. The court may, for good cause, extend the time:

- (A) with or without motion or notice if the courts acts, or if a request is made, before the original time or its extension expires; or
- (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

LRIA6-1 states in pertinent part:

- (a) A motion or stipulation to extend dime must state the reasons for the extension requested and must inform the court of all previous extension of the subject deadline the court granted.
- (b) A stipulation or motion to seeking to extend the time to file an opposition or reply to a motion, or to extend the time fixed for hearing a motion, must state in its opening paragraph the filing date of the subject motion or the date of the subject hearing.

Based upon the declaration of counsel, good cause exists for the extension of plaintiff's time from September 1, 2021 to September 14, 2021 to reply to defendant's response to plaintiff's motion for in camera review of the Football Leaks documents to determine whether the crime fraud exception applies [ECF NO. 124].

1 Case No.: 2:19-cv-00168-JAD-DJA  
2 Mayorga v. Ronaldo  
3 Motion to Extend time

4 DATED this 1 day of September, 2021.

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6 STOVALL & ASSOCIATES

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 1<sup>st</sup> day of September, 2021, service of the foregoing Plaintiff's Motion to Extend Time to reply to defendant's response to plaintiff's motion for in camera review of the Football Leaks documents to determine whether the crime fraud exception applies [ECF NO. 124] was made this date through the court's electronic filing system to the following:

Christiansen Trial Lawyers  
710 South 7th Street, Suite B  
Las Vegas, NV 89101  
Phone (702) 240-7979  
Fax (866) 412-6992  
Attorneys for the defendant

/s/ Maria Hernandez

An employee of STOVALL & ASSOCIATES